

HON. KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REC ROOM, INC.,

Plaintiff,

v.

M.Z.,

Defendant.

No. 2:23-cv-01586

**UNOPPOSED JOINT MOTION TO
STAY PROCEEDINGS**

NOTE ON MOTION CALENDAR:
April 9, 2025

Plaintiff Rec Room, Inc. (“Plaintiff”) and Defendant M.Z. (“Defendant”), collectively “The Parties,” hereby respectfully and jointly request that the Court enter an Order staying all proceedings in this litigation for two months to permit parties to focus on settlement negotiations. In support of this joint motion, the parties state as follows:

**UNOPPOSED JOINT MOTION
TO STAY PROCEEDINGS – 1**
(Case No. 2:23-cv-01586-KKE)

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- 1 1. Parties have been conducting discovery pursuant to the Court's September 10, 2024
- 2 Scheduling Order.
- 3
- 4 2. The Parties have been in contact with regards to a possible settlement of this action.
- 5
- 6 3. On March 27, counsel for Plaintiff and Defendant conferred to discuss the possibility of
- 7 a settlement.
- 8
- 9 4. The Parties agree to continue negotiating in good faith toward a resolution of this action.
- 10
- 11 5. The Parties agree that it will promote judicial economy and limit costs if further litigation
- 12 of this matter is stayed pending continuing settlement discussions between the Parties.
- 13
- 14 6. The Parties further agree that neither party will be prejudiced if this action is stayed for
- 15 two months.

16 Therefore, the Parties respectfully request a stay of all further proceedings and deadlines
17 until May 26, 2025, including the deadlines for discovery motions and the completion of
18 discovery. The Parties jointly request deadline for the close of discovery be moved accordingly
19 to July 25, 2025. The Parties stipulate that none of the Parties shall construe any Order issued in
20 response to the Parties' Joint Motion to Stay Proceedings as addressing the materiality of any
21 issue, or urgency or necessity of any claim in the Complaint. The Parties also stipulate to file a
22 joint status update with the Court on May 15, 2025.

23 Counsel for Defendant review and approved the text of this Motion on April 8, 2025.

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**UNOPPOSED JOINT MOTION TO
TO STAY PROCEEDINGS – 2**
(Case No. 2:23-cv-01586-KKE)

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1 Dated: April 10, 2025
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3
4
5

/s/ Brian Esler

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and

/s/ Dylan M. Schmeyer

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**UNOPPOSED JOINT MOTION TO
TO STAY PROCEEDINGS – 3**
(Case No. 2:23-cv-01586-KKE)

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ORDER

The stipulated motion to stay is GRANTED. Dkt. No. 43. The case schedule is VACATED. Dkt. No. 37. At request of the parties, the deadline for the close of discovery is set for July 25, 2025. The parties shall file a joint status report by May 15, 2025 setting forth the case status and recommendations on future deadlines, if any. IT IS SO ORDERED.

ORDERED this 10th day of April, 2025



Kymberly K. Evanson
United States District Judge